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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**Access Charge Reform;
Price Cap Performance Review
for Local Exchange Carriers;
Low-Volume Long Distance Users;
Federal-State Joint Board On Universal Service**

**CC Docket No. 96-262
CC Docket No. 94-1
CC Docket No. 99-249
CC Docket No. 96-45**

**REQUEST BY THE
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS
FOR THE FCC TO EXTEND THE TIME TO FILE COMMENTS**

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Pursuant to Sections 1.46 and 1.44 of the Federal Communication Commission's ("FCC" or "Commission") General Rules of Practice and Procedure, 47 C.F.R. Sections 1.46 and 1.44 (1999), the National Association of Regulatory Utility Commissioners ("NARUC") respectfully requests that the Commission extend the time for filing comments in these proceedings an additional fourteen (14) days to November 12, 1999 for initial comments and to December 3, 1999 for Replies. In support of this request, NARUC states the following:

I.

NARUC is a quasi-governmental nonprofit organization founded in 1889. NARUC includes within its membership the governmental bodies of the fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands charged with the duty of regulating the telecommunications common carriers within their respective borders. They have the obligation to assure that telecommunications services and facilities required by the public convenience and necessity are provided and maintained and that service is provided at rates that are just and reasonable. The Telecommunications Act of 1996 ("Act") increased the burdens and responsibilities on these commissions and requires them to work closely with the FCC to implement the pro-competitive goals of the Act while preserving universal service. As discussed below, the proposal presented for review in this proceeding will clearly have a dramatic impact upon State's obligations under both the 1996 Act and their own enabling statutes..

II.

On September 15, 1999, the Commission released a Notice of Proposed Rulemaking seeking comment on a proposal submitted by the Coalition for Affordable Local and Long Distance Service ("CALLS") on July 29, 1999. The CALLS Proposal is an interstate universal service and interstate access reform plan covering price cap incumbent local exchange carriers ("ILEC's"). This proposal was developed through negotiation among the following ILECs and interexchange carriers: AT&T, Bell Atlantic, BellSouth, GTE, Sprint, and SBC. CALLS offers the proposal as a comprehensive solution to the membership's access charge, universal service, and price cap concerns. It is designed to be implemented over a five-year period beginning in January 2000 and would apply to those carriers who voluntarily elect to participate.

III.

The September 15, 1999 notice sets (i) October 25, 1999 as the date for interested persons to file initial comments and (ii) November 17, 1999 as the final day to reply to those initial comments.

IV.

Whatever its merits and flaws, the CALLS proposal clearly raises a host of issues of direct and critical concern to NARUC's State commission membership, e.g., the unspecified increased funding costs for the increased Lifeline funding suggested by the plan, the fact it does not identify a source of revenue for those additional Lifeline expenses, the questions concerning how the proposal impacts ongoing separations reform, the determination to set the "implicit" universal service subsidy in access charges at \$650 million, the apparent conversion of some ILEC revenues that are currently at risk in a competitive market to low-risk or no-risk recovery mechanisms, possible Section 254(k) issues, the impact of deaveraging the Subscriber line charges, etc.

V.

NARUC is holding its annual meetings November 7th through 10th, shortly after the deadline for filing initial comments. Because of the critical importance of the issues raised by the this proposal, NARUC established regular and ongoing conference calls to discuss the proposal shortly after the FCC issued its notice. We have exchanges some preliminary issue papers, invited CALL's spokespersons on conference calls for discussions, and are considering a resolutions. However, it will not be possible to achieve a formal consensus position until the convention. Moreover, all of the States examining the rather lengthy CALLS proposal on both the smaller calls to specifically discuss the proposal (approximately 15) and on the larger weekly calls on telecom issues (upwards of 25) urged NARUC to file this request to give NARUC's member states more time to digest the implications of the proposal and draft fully informed comments.

VI.

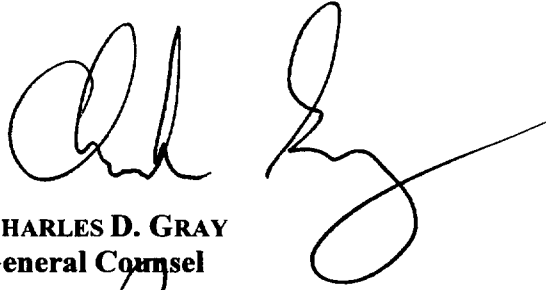
This proposal (i) clearly raises issues of concern to the NARUC's state commission membership and (ii) could impact upon these members' ability to adhere to their respective mandates to serve the public interest. No other participant's filed initial and reply comments can adequately represent the viewpoint of NARUC and its membership. This viewpoint is necessary to fully illuminate the issues raised by the FCC's proposal and assure a complete record upon which to base a decision. Hence, granting the requested extension will serve the public interest by ensuring NARUC's continued full participation.

VII.

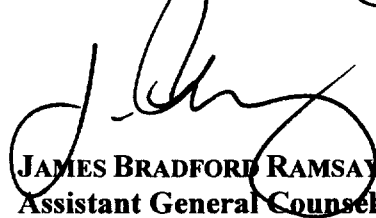
Moreover, no party can be significantly prejudiced by the delay. Because NARUC's convention begins closely on the heels of the originally proposed filing dates, only a short extension is necessary to assure NARUC's full participation.

VII.

Accordingly, because of the critical importance of the issues raised by the proposal to NARUC's membership, the close proximity of NARUC's meeting to the deadlines already posed, and NARUC's inability to formulate a consensus position on those critical issues until its winter meeting, NARUC respectfully requests that the FCC grant a fourteen (14) day extension of the time to file initial and reply comments in the above-captioned proceeding.



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